

**REMARKS**

Reconsideration and allowance of the above-identified application is respectfully requested. A Petition to Revive the application is being submitted concurrently.

**Pending claims:**

Claims 1-34 are pending. Claims 1, 7, 12, 19, 24, and 30-32 are in independent form.

**Formal issues:**

No formal issues are noted in the pending Official Action.

**Patentability:**

**1. Claims 1-34 rejected as anticipated by Haines:**

Claims 1-34 were rejected under 35 U.S.C. § 102(b) as being anticipated by Haines.

Applicant traverses this rejection with respect to claims 6, 9, 11, 13, 18-29, and 31-34. As admitted by the Examiner in rejecting these claims under 35 U.S.C. § 103 in the Official Action, Haines fails to anticipate the subject matter recited in these claims.

**a. Independent claim 1:**

Haines ('884) fails to teach or suggest at least a postal security device as claimed in claim 1, including at column 2, lines 40-43 or at column 5, lines 7-9 (as cited by the Examiner). As explained in the present application, a postal security device is a separate unit meant to be plugged into the value metering module to

permit operation. See, for example, page 14, line 9 of the present application to page 15, line 21.

Haines also fails to teach or suggest means for generating an authorization code for enabling certain designated operating features. Haines discloses inputting a user-selected (or, at least, a pre-selected) input/output configuration number via keyboard entry. (See, for example, column 2, lines 53-55.) This number is not generated by the system. Moreover, it is this number that permits operational communication with other external devices. (Column 3, lines 3-5.)

Claim 1 is therefore patentable over Haines, as are the respective claims depending directly or indirectly therefrom. Withdrawal of this rejection is therefore believed appropriate.

**b. Independent claim 7:**

As mentioned above, Haines fails to teach or suggest a value metering device postal security device as is also claimed in claim 7.

Haines fails to teach or suggest means for selecting at least one operating feature for enablement. Column 13, lines 54-67 of Haines does not teach or suggest operation feature selection.

Haines fails to teach or suggest means for determining a unique serial number from a respective operating feature and, particularly, for adding the unique serial number to the parameter list.

Haines fails to teach or suggest means for generating an authorization code based on the parameter list, as claimed. The Examiner cites column 14, lines 39-56 of Haines, but at that point, Haines does not disclose configuration code generation based on a list of operating features of the system (which are stored in the claimed parameter list).

In view of the foregoing, claim 7 is patentable over Haines, as are the respective claims depending directly or indirectly therefrom.

**c. Independent claim 12:**

Claim 12 is patentable over Haines for reasons similar to those set forth above relative to claims 1 and 7, particularly, but not exclusively, because Haines does not teach or suggest a postal security device as claimed.

Claim 12 is therefore patentable over Haines, as are the claims depending directly or indirectly therefrom.

**d. Independent claim 30:**

Claim 30 is patentable over Haines for reasons similar to those set forth above relative to claims 1, 7, and 12, particularly, but not exclusively, because Haines does not teach or suggest a postal security device as claimed.

Claim 30 is therefore patentable over Haines, as are the claims depending directly or indirectly therefrom.

**e. Dependent claims 5, 8, 10, and 14-17:**

Claims 5, 8, 10, and 14-17 are patentable over Haines at least by their direct or indirect dependence from independent claims 1, 7, and 12.

**2. Claims 6, 19, 20, and 22-28 rejected as being obvious over Haines in view of Cornell et al.:**

**a. Dependent claim 6:**

Claim 6 depends indirectly from independent claim 1. Cornell et al. add no teaching or suggestion to Haines that overcomes the above-noted deficiencies of Haines alone with respect to claim 1. Therefore, independent claim 1 is still

patentable over the combination of Haines and Cornell et al., as is claim 6 depending therefrom.

In addition, Applicant disputes the Examiner's assertion that the transport mechanism in Cornell et al. inherently includes transport speed control. While the Examiner has pointed out reasons why transport speed control may be desirable in Cornell et al., nothing in the reference conclusively teaches (implicitly or otherwise) whether or not speed control is contemplated. One of skill in the art would have recognized that a transport mechanism having a steady transport speed is perfectly legitimate in this field of endeavor.

For at least this reason, claim 6 is patentable over the prior art in its own right.

**b. Independent claim 19:**

Haines fails to teach or suggest at least the "means for generating an authorization code for enabling certain designated operating features" recited in claim 19. A careful review of Haines clearly indicates that the mentioned input/output configuration number ("IOCN") is read by the meter to implement the feature set represented by the IOCN. (Column 3, lines 1-5.)

However, Haines plainly discloses that the IOCN is user inputted, and not system generated. See, for example, column 2, lines 54-55. ("A desired new IOCN is entered via keyboard entry.")

Cornell et al. provide no teaching or suggestion alone or in combination with Haines that overcomes this deficiency.

Accordingly, claim 19 is patentable over Haines in view of Cornell et al., as are the respective claims depending directly or indirectly therefrom.

**c. Independent claim 24:**

Haines fails to teach or suggest at least the "means for generating an authorization code for enabling certain designated operating features" recited in claim 24. As mentioned above relative to claim 19, the mentioned input/output configuration number ("IOCN") is read by the meter to implement the feature set represented by the IOCN. (Column 3, lines 1-5.) Haines discloses that the IOCN is user inputted, and not system generated. See, for example, column 2, lines 54-55. ("A desired new IOCN is entered via keyboard entry.")

Cornell et al. provide no teaching or suggestion alone or in combination with Haines that overcomes this deficiency.

Accordingly, claim 24 is patentable over Haines in view of Cornell et al., as are the respective claims depending directly or indirectly therefrom.

**d. Dependent claims 20, 22, 23, and 25-28:**

Claims 20, 22, 23, and 25-28 depend directly or indirectly from independent claim 19, and are patentable for at least this reason.

**3. Claims 11, 31, and 32 rejected as being obvious over Haines in view of Durst Jr. et al.:**

**a. Dependent claim 11:**

Claim 11 depends from independent claim 7. Durst Jr. et al. add no teaching or suggestion to Haines that overcome the deficiencies of Haines alone noted above relative to claim 7. Therefore claim 7 remains patentable over Haines in combination with Durst Jr. et al., and claim 11 is patentable at least by its dependence from claim 7.

**b. Independent claim 31:**

Haines in combination with Durst Jr. et al. fail to teach or suggest at least the means for generating an authorization code for enabling designated operating features for a feeder function and a stacker function.

As mentioned above relative to claims 19 and 24, the mentioned input/output configuration number ("IOCN") in Haines is read by the meter to implement the feature set represented by the IOCN. (Column 3, lines 1-5.) Haines discloses that the IOCN is user inputted, and not system generated. See, for example, column 2, lines 54-55. ("A desired new IOCN is entered via keyboard entry.")

Durst Jr. et al. provide no teaching or suggestion alone or in combination with Haines that overcomes this deficiency.

Claim 31 is therefore patentable over the relied upon combination of references.

**c. Independent claim 32:**

Claim 32 is patentable over the combination of Haines in view of Durst Jr. et al. for reasons similar to those set forth relative to claim 31, particularly with respect to the claimed means for generating an authorization code for enabling certain designated operating features for a feeder function and a scale function and a stacker function. Withdrawal of this rejection is therefore believed appropriate.

**4. Claims 13 and 18 rejected as being obvious over Haines.**

Claims 13 and 18 both depend from independent claim 12, which claim was rejected as being anticipated by Haines alone. For the reasons set forth above, claim 12 is patentable over Haines, as are claims 13 and 18 depending from claim 12.

**5. Claims 21, 29, 33, and 34 rejected as being obvious over Haines in view of Cornell et al., and further in view of Durst Jr. et al.:**

Claims 21, 29, 33, and 34 depend from independent claims 19, 24, 31, and 32, respectively.

Cornell et al. and Durst Jr. et al. add no teaching or suggestion to the combinations of Haines and Durst Jr. et al. and Haines and Cornell et al., respectively, that overcome the previously noted deficiencies of the underlying combination of references. Accordingly, independent claims 19, 24, 31, and 32 are still patentable over the expanded combinations of references cited here, as are dependent claims 21, 29, 33, and 34.

**Conclusion:**

In view of the foregoing, favorable reconsideration on the merits is solicited. Should the Examiner feel a further telephonic discussion regarding this application would be useful, he is invited to contact Applicant's undersigned attorney by email or by fax so that the necessary arrangements can be made.

Any fee needed in connection with this paper should be charged to Deposit Account No. 502-927.

Respectfully submitted,

**CABINET BEAU DE LOMENIE**

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